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June 17, 2013

Maureen Benitz
Senior Campaign Finance and Reviewing Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

RE: Huntington Bancshares Inc. Political Action Committee (HBI-PAC) February Monthly Report (1/1/2013 - 1/31/2013);
Identification Number C00165589

Dear Ms. Benitz:

This Form 99 Miscellaneous Report is being filed in response to the May 20, 2013 Request for Additional Information ("RFAI") from the FEC concerning the February Monthly Report (1/1/2013 - 1/31/2013) filed by the Huntington Bancshares Inc. Political Action Committee ("HBI-PAC").

During an internal review of the PAC's records, which review covered the past few years, it was discovered by HBI that the balance on HBI-PAC's FEC report exceeded the PAC's bank balance by \$23,550.28. It is believed that the discrepancy is the result of duplicate receipts being disclosed on FEC reports previously filed by HBI-PAC. Unfortunately, this discrepancy appears to have occurred a number of years ago and HBI is unable to identify the exact source of the duplicate receipts. Since HBI-PAC is unable to identify the exact source of the discrepancy, which discrepancy occurred several years ago, HBI-PAC included an accounting adjustment of \$23,550.28 on its February Monthly report reducing the PAC's cash-on-hand in order to reconcile the balance of the FEC report with the balance in the PAC's bank account.

Please be advised that HBI-PAC has incorporated changes in the way the PAC's account is reconciled and has created additional controls to ensure that the PAC's account is reconciled each month, thereby eliminating the need for any accounting adjustments in the future. On behalf of HBI-PAC, we trust that this response fully and adequately fulfills your request for additional information.

Sincerely,

David Anderson
PAC Treasurer
Huntington Bancshares Inc. Political Action Committee (HBI-PAC)
FEC ID C00165589
